

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Southern District of New York
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May 2, 2023

BY ECF

The Honorable Paul G. Gardephe
Southern District of New York
United States Courthouse
40 Foley Square, Rm. 705
New York, New York 10007

Re: **United States v. Daniel Bertini**
23-CR-0061 (PGG)

Dear Judge Gardephe:

Daniel Bertini, through undersigned counsel, respectfully submits this letter in support of his request to modify the terms of his pretrial release. Specifically, Mr. Bertini, who is on home detention, seeks permission to take his mother out to eat for Mother's Day at [REDACTED], located at [REDACTED], New York, NY 10001. Mr. Bertini currently works at [REDACTED] as a waiter, and because he will be working on Mother's Day, he seeks permission to take his mother out to celebrate Mother's Day on Monday, May 8, 2023 from 6:00 p.m. to 9:00 p.m.

Undersigned counsel has conferred with pretrial services and the government about this request. Pretrial services objects to the request and the government defers to pretrial services.

MEMO ENDORSED
The application is denied.

NO ORDERED:

Paul M. Sand
Paul G. Gardephe, U.S.D.

Dated: *May 3, 2023*

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Respectfully Submitted,

/s/

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Cc: United States Pretrial Services Officer Francesca Piperato (via email);
Assistant United States Attorneys Jonathan Bodansky (via ECF)